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Berlin-Wheeler, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMBER WILLIAMS,
Plaintiff,

vs.

BERLIN-WHEELER, INC.,
Defendants.

Case No.: 2:23-cv-00746-GMN-DJA

**STIPULATION FOR EXTENSION OF
TIME**

(First Request for Responsive Pleading)

Complaint Filed: May 11, 2023

Pursuant to LR IA 6-1, Plaintiff AMBER WILLIAMS (“Plaintiff”) and Defendant BERLIN-WHEELER, INC., (“Defendant”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and request that this Court extend the deadline for Defendant to file a Pleading Responsive to Plaintiff’s Petition by 7 one (1) week, to June 13, 2023. This is the Parties’ first request to extend the responsive pleading deadline. In support of this Stipulation and Request, the Parties state as follows:

B. CASE EVENTS TO DATE

1. On May 11, 2023, Plaintiff filed her Complaint. ECF No. 1.
2. On or about May 16, 2023, Defendant’s resident agent was served with the Summons and Complaint.

B. REASON FOR THE REQUEST OF CASE DEADLINES

The Parties seek an extension of THE Responsive Pleading deadline as Defendant requires
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additional time to review the Complaint, complete an internal investigation concerning the allegations, discuss potential resolution of the matter with Defendant, and draft a Responsive Pleading. Without the requested extension, the Parties believe that prejudice may result.

For this reason, the Parties request that the Court grant this stipulation for an extension of time.

C. PROPOSED DEADLINES

	<u>Prior Deadlines</u>	<u>Proposed Deadlines</u>
Responsive Pleading:	June 6, 2023	June 13, 2023

The Parties request that the above-referenced scheduling order be entered.

IT IS SO STIPULATED.

FREEDOM LAW FIRM, LLC

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ATTORNEYS FOR DEFENDANT, BERLIN-WHEELER, INC.

IT IS SO ORDERED


United States District Court Magistrate Judge

Dated: 6/8/2023

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